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February 15, 2024

Via ECF

Hon. Jennifer E. Willis, U.S.M.J.
United States District Court, Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Franco v. 380 Second LLC et al*
Case No.: 1:22-cv-04011-PAE-JW

Dear Honorable Magistrate Judge Willis:

This law firm represents Defendant Small Door Gramercy LLC (“Small Door Gramercy”) in the above-referenced action. This letter is filed jointly with counsel for Defendant 380 Second LLC (“380 Second”).

Pursuant to Your Honor’s Individual Rules, this letter respectfully serves to request a two (2) week extension of time to file Defendants’ Reply in further support of their Motions for Summary Judgment from February 19, 2024 to, through and including, March 4, 2024. Plaintiff takes no position on the instant request.

This is the second request of its kind. On January 24, 2024, counsel for Plaintiff Milagros Franco (the “Plaintiff”) filed a request (on consent) to extend Plaintiff’s time to file their opposition to Defendants’ Motions for Summary Judgment from January 29, 2024 to, through and including, February 5, 2024. This request resulted in an extension of Defendants’ time to file their reply from February 12, 2024 to, through and including, February 19, 2024.

The basis of this request is that the undersigned law firm’s co-counsel is traveling internationally during the week of February 19, 2024. As a result of the staffing issues, an extension of time to file Defendants’ reply to their Motions for Summary Judgment is needed.

A second, independent basis also necessitates the instant request. Defendants require additional time to respond to contentions raised in Plaintiffs’ opposition to the Motions for Summary Judgment.

In light of the foregoing, it is respectfully requested that the Court grant an extension of time to file Defendants’ Reply in further support of their Motions for Summary Judgment from February 19, 2024 to, through and including, March 4, 2024.

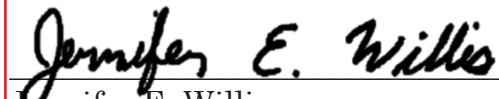
We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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Cc: All Counsel, via ECF.

The extension request is GRANTED. This Court is not likely to grant further extension requests absent extraordinarily good cause. SO ORDERED.



Jennifer E. Willis
United States Magistrate Judge

February 16, 2024